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SENT VIA ECF AND EMAIL: John Gallagher@paed.uscourts.gov

he Honorable John M. Gallagher
United States District Judge
504 W. Hamilton Street, Suite 4701
Allentown, PA 18101

**Re: James Amor et al. v. Courtney Conover
Civil Action No: 5:21-CV-05574-JMG**

Dear Judge Gallagher:

I am writing in anticipation of our conference tomorrow at 10:00 AM. Although this letter does not require a response from Defendant, I have filed it on the docket to ensure that she receives notice of its content.

Plaintiffs will prove 'Success on the Merits' through their testimony. Plaintiffs may take the Defendant as on cross. Plaintiffs may also call, as fact witnesses, Christine Manss and Lois Dietler. It is expected that all these witnesses will contradict any defamatory allegations by the Defendant, assuming those allegations are admissible as cognizable evidence.

Dr. James Amor will testify to 'Irreparable Harm' based on his professional reputation as a dentist. Dr. Amor will testify that his profession requires him to be above reproach and how the Defendant's allegations could irreparably hurt his reputation for trust, given his position and the

vulnerability of his patients. Finally, Dr. Amor will testify that the dental profession takes this trust extremely seriously and requires continuing medical and ethical education on this issue.

Plaintiff will call Defendant as on cross to establish that she has no detriment if the preliminary injunction is granted. Plaintiff Amor will have already testified about what he stands to lose if the injunction is not granted.

Plaintiffs' attorney shall argue, in the discretion of the Court, the issue of the public interest in granting the injunction.

Plaintiffs believe that they can make their case in no more than 4 hours.

Respectfully submitted,

KOLMAN LAW, P.C.

/s/ Timothy M. Kolman

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